UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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: CASE NO. 5-18-04529-RNO

MICHAEL C. BOYLE

CHAPTER 13

Debtor :

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DEBTOR'S ANSWER TO THE MOTION OF FOR RELIEF FROM THE AUTOMATIC STAY UNDER §362

Debtor, Michael C. Boyle, through his undersigned counsel, hereby responds to the Motion for Relief from the Automatic Stay filed by Wilmington Savings Fund Society as follows:

- 1. Denied. Debtor does not have sufficient information to admit or deny the allegations contained in paragraph 1. Strict proof of the averments are required at the time of trial.
 - 2. Admitted.
 - 3. Admitted.
 - 4. Denied. Strict proof of the averments are required at the time of trial.
 - 5. Denied. Strict proof of the averments are required at the time of trial.
 - 6. Denied. Strict proof of the averments are required at the time of trial.
 - 7. Denied. Strict proof of the averments are required at the time of trial.
 - 8. Denied. Strict proof of the averments are required at the time of trial.
 - 9. Denied. Strict proof of the averments are required at the time of trial.

WHEREFORE, the Debtor respectfully requests that this Honorable Court enter an Order denying the Relief requested by Wilmington Savings Fund Society and for such other and further relief is just and appropriate.

Respectfully submitted,

CONWAY LAW OFFICES, P. C.

/s/ Mark J. Conway MARK J. CONWAY (ID #59114) 502 S. Blakely Street Dunmore, PA 18512 Phone (570) 343-5350 Fax (570) 343-5377

Attorney for Debtor

DATED: July 1, 2020

UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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CASE NO. 5-18-04529-RNO

MICHAEL C. BOYLE

CHAPTER 13

Debtor

CERTIFICATE OF SERVICE

I, Amy L. Marta, Paralegal hereby certify that I caused a true and correct copy of the foregoing Answer to the Motion for Relief From Automatic Stay Under §362 to be served via e-mail to the following:

> Charles J. DeHart, III Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 dehartstaff@pamd13trustee.com

James C. Warmbrodt, Esquire KML Law Group, P.C. 701 Market Street, Ste. 5000 Philadelphia, PA 19106-1532 jwarmbrodt@kmllawgroup.com

CONWAY LAW OFFICES, P.C.

/s/ Amy L. Marta Amy L. Marta, Paralegal

502 S. Blakely Street Dunmore, PA 18512 Phone (570) 343-5350 Fax (570) 343-5377

DATED: July 1, 2020